

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., individually and
on Behalf of a Class of persons
similarly Situated,

Plaintiff,

City of SUMMERVILLE, GEORGIA,

Intervenor – Plaintiff,

v.

3M COMPANY, et al.,

Defendants.

CASE NO.: 4:21-cv-00040-TWT

**CITY OF SUMMERVILLE, GEORGIA’S CROSS-NOTICE OF NOTICE
OF CONTINUATION OF 30(B)(6) VIDEOTAPE DEPOSITION OF
DEFENDANT MOUNT VERNON MILLS, INC. AND OF RON BEEGLE IN
HIS INDIVIDUAL CAPACITY**

PLEASE TAKE NOTICE, pursuant to Rule 30 of the Federal Rules of Civil Procedure, counsel for Intervenor-Plaintiff City of Summerville, Georgia hereby cross-notices in this matter the continuation of the oral deposition of Mount Vernon Mills, Inc, and Ron Beegle, in his individual capacity.

The deposition will commence on August 3, 2023, beginning at 10:00 a.m. Eastern Standard Time, at the offices of Troutman, Pepper, Hamilton, Sanders, LLP, 600 Peachtree Street NE, Suite 3000, Atlanta, GA 30308. The deponent(s)

and deponent(s)'s counsel will conduct and attend the deposition at the location shown above. All other parties and/or their respective counsel are invited to attend the deposition via a virtual video conferencing platform provided by Huseby to all parties in advance of the deposition.

The deposition will be taken before a court reporter authorized to administer oaths, pursuant to Federal Rule of Civil Procedure 28, and will be recorded on videotape. This deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure and the local rules.

NOTICE IS FURTHER GIVEN that the deponent(s) will be deposed concerning the following issues:

1. Your organizational structure, including management structure.
2. Your communications with any named Defendant pertaining to the use of materials containing PFAS or the presence of PFAS in wastewater discharged by You to the Town of Trion Water Pollution Control Plant ("Trion WPCP").
3. Your communications with any suppliers of PFAS-containing products used by You.
4. The Industrial User Permit issued by Defendant Town of Trion, Georgia ("Trion") to You, including applications and supporting materials.

5. Any safety data sheets, material safety data sheets, product toxicity summary sheets, product environmental evaluations, or lists of chemicals pertaining to PFAS-containing products used by You.
6. Any list of chemicals or substances discharged into the Trion WPCP by You.
7. Any knowledge of Trion's WPCP Land Application Program and Sludge Management Plan, including Land Application Agreements with landowners.
8. Any knowledge of the capacity, or lack thereof, of Trion's WPCP to remove PFAS from wastewater.
9. Correspondence with government officials, the public and others concerning the use or disposal of PFAS.
10. The chemical, physical, biological, and toxicological properties of PFAS.
11. Your relationship with any entity that has provided advice or consulting to You regarding environmental matters, including, but not limited to, the presence of PFAS the wastewater.
12. Your document retention policies, and the custodians of documents pertaining to the Designated Issues above including the location and form in which documents are maintained.

13. Your communications with City of Summerville and/or any representatives of the City of Summerville regarding PFAS or the presence of PFAS in the City of Summerville's water supply.

Respectfully submitted this 20th day of June 2023.

**BRINSON, ASKEW, BERRY, SEIGLER,
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/s/ J. Anderson Davis
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/s/ Jeffrey E. Friedman
JEFFREY E. FRIEDMAN
LEE T. PATTERSON
**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served all counsel of record with a copy of the foregoing **CITY OF SUMMERVILLE, GEORGIA'S CROSS-NOTICE OF NOTICE OF CONTINUATION OF 30(B)(6) VIDEOTAPE DEPOSITION OF DEFENDANT MOUNT VERNON MILLS, INC. AND OF RON BEEGLE IN HIS INDIVIDUAL CAPACITY** and with the Clerk of Court using the CM/ECF filing system.

This 20th day of June, 2023.

**BRINSON, ASKEW, BERRY, SEIGLER,
RICHARDSON & DAVIS, LLP**

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